

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

June 6, 2007
BRUCE RYKIN, Clerk
By Joshua Thomas Deputy

07-CR-00207-INDI

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEAN JARAE HART,
a/k/a Hush,
RANDY WAMON IVEY,
and
LANDON CONNER,
a/k/a Landoe,

Defendants.

NO. CR07-207 JCC

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy to Engage in Sex Trafficking of a Minor)

During May 2006, and continuing through and including June 9, 2006, in the Western District of Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH, RANDY WAMON IVEY, and other persons known and unknown to the grand jury, knowingly did conspire and agree with each other, in and affecting interstate commerce, to recruit, entice, harbor, transport, provide, and obtain by any means, a juvenile female, hereinafter referred to as JF1, who was under the age of 18 years, knowing that JF1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(2).

INDICTMENT

United States v. Sean Jarae Hart, et al. - 1

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1 **A. Object of the Conspiracy**

2 The object of the conspiracy was to make money through the recruitment and
3 exploitation of JF1, who was under the age of 18 years, as part of an interstate prostitution
4 scheme.

5 **B. Manner and Means of the Conspiracy**

6 1. It was part of the conspiracy that the defendants recruited and solicited JF1,
7 who was under the age of 18 years, to engage in commercial sex acts.

8 2. It was further part of the conspiracy that the SEAN JARAE HART a/k/a
9 HUSH instructed, directed, managed and supervised JF1's prostitution activities, which
10 included transporting her between Washington and Oregon, and requiring her to release to
11 him nearly all of her earnings from commercial sex acts.

12 3. It was further part of the conspiracy that SEAN JARAE HART a/k/a HUSH
13 and RANDY WAMON IVEY used cellular telephones to contact each other regarding
14 JF1's anticipated prostitution activities and to arrange her transportation between them.

15 **C. Overt Acts in Furtherance of the Conspiracy**

16 During and in furtherance of the conspiracy, one or more of the conspirators
17 committed one or more of the following overt acts, among other overt acts:

18 1. The offenses alleged in Counts 3, 4, 5, and 6, are incorporated by reference
19 as overt acts committed during and in furtherance of the conspiracy.

20 2. During May 2006, RANDY WAMON IVEY, together with another
21 individual known to the grand jury, caused JF1 to travel from California, to Washington,
22 for the purpose of engaging in prostitution.

23 3. During May 2006, JF1 arrived in Washington and met with RANDY
24 WAMON IVEY. IVEY then contacted SEAN JARAE HART a/k/a HUSH, using a
25 cellular telephone, to arrange the transfer and transportation of JF1 to HART for the
26 purpose of prostitution.

27 4. During May 2006, SEAN JARAE HART a/k/a HUSH caused JF1 to work
28 as a prostitute in the Puget Sound region of Washington State.

5. During and between May 2006, and June 2006, SEAN JARAE HART a/k/a HUSH transported JF1 from Washington to Oregon for the purpose of engaging in prostitution, knowing that JF1 was under the age of 18.

6. During and between May 2006, and June 2006, SEAN JARAE HART a/k/a HUSH transported JF1 from Oregon to Washington for the purpose of engaging in prostitution, knowing that JF1 was under the age of 18.

All in violation of Title 18, United States Code, Sections 371, 1591(a)(1), 1591(b)(2), and 2.

COUNT 2
(Conspiracy to Transport a Female with Intent to Engage in Prostitution)

Sometime in May 2006, in the Western District of Washington and elsewhere, RANDY WAMON IVEY, and other persons known and unknown to the grand jury, knowingly did conspire and agree with each other, to transport and aid and abet the transportation of a juvenile female, JF1, in interstate commerce, specifically, from California to Washington, with the intent that JF1 engage in prostitution, in violation of Title 18, United States Code, Section 2421.

A. Object of the Conspiracy

The object of the conspiracy was to make money through the recruitment and exploitation of JF1 as part of an interstate prostitution scheme.

B. Manner and Means of the Conspiracy

1. It was part of the conspiracy that IVEY agreed with another person to the transportation and movement of JF1 from California to Washington.

2. It was part of the conspiracy that IVEY intended to manage and supervise the activities of JF1 as a prostitute in Washington.

C. Overt Acts

During and in furtherance of the conspiracy, the following overt acts, among other overt acts, were committed:

1. The offense alleged in Count 3 is incorporated by reference as an overt act committed during and in furtherance of the conspiracy.

2. On May 24, 2006, an unnamed coconspirator, known to the grand jury, arranged for JF1 to be transported from California, to SeaTac, Washington, by airplane. JF1 arrived in SeaTac, Washington, on the same day and met with RANDY WAMON IVEY.

3. On May 24, 2006, RANDY WAMON IVEY picked up JF1 at SeaTac International Airport, and intended JF1 to work for him as a prostitute.

All in violation of Title 18, United States Code, Sections 371, 2421, and 2.

COUNT 3
(Interstate Transportation in Furtherance of Prostitution)

During May 2006, in the Western District of Washington, and elsewhere, RANDY WAMON IVEY knowingly transported, and aided and abetted the transportation of a juvenile female, JF1, in interstate commerce, specifically, from California to Washington, with the intent that JF1 engage in prostitution.

The Grand Jury alleges that this offense was committed during and in furtherance of the conspiracies charged in Counts 1 and 2 above.

All in violation of Title 18, United States Code, Section 2421 and 2.

COUNT 4
(Sex Trafficking of a Child)

During May 2006, and continuing through and including June 9, 2006, within the Western District of Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH, did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, and obtain by any means, a juvenile female, JF1, with knowledge that JF1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

1 The Grand Jury further alleges that this offense was effected by force, fraud, and
2 coercion.

3 The Grand Jury further alleges that this offense committed during and in
4 furtherance of the conspiracy charged in Count 1 above.

5 All in violation of Title 18, United States Code, Sections 1591(a)(1) and
6 1591(b)(1).

7
8 **COUNT 5**
9 **(Interstate Transportation in Furtherance of Prostitution)**

10 During May 2006, and continuing through and including June 9, 2006, within the
11 Western District of Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH, did
12 knowingly transport, and aid and abet the transportation of, a juvenile female, JF1, who
13 was under the age of 18 years, in interstate commerce, specifically from Washington to
14 Oregon, with the intent that JF1 engage in prostitution.

15 The Grand Jury alleges that this offense was committed during and in furtherance
16 of the conspiracy charged in Count 1 above.

17 All in violation of Title 18, United States Code, Sections 2423 and 2.

18
19 **COUNT 6**
20 **(Interstate Transportation in Furtherance of Prostitution)**

21 During May 2006, and continuing through and including June 9, 2006, within the
22 Western District of Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH, did
23 knowingly transport, and aid and abet the transportation of, a juvenile female, JF1, who
24 was under the age of 18 years, in interstate commerce, from Oregon to Washington, with
the intent that JF1 engage in prostitution.

25 The Grand Jury alleges that this offense was committed during and in furtherance
26 of the conspiracy charged in Count 1 above.

27 All in violation of Title 18, United States Code, Sections 2423 and 2.
28

COUNT 7
(Misprision of Felony)

On or about June 2, 2006, in the Western District of Washington, LANDON CONNER a/k/a LANDOE, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, Sex Trafficking of a Child, did conceal the same by informing the perpetrator of that crime, Sean Jarae Hart, that law enforcement was searching for him and for the victim of said crime (JF1), and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT 8
(Making a False Statement to a Federal Investigator)

Beginning on or about June 2, 2006, and continuing through June 3, 2006, in the Western District of Washington, in a matter within the jurisdiction of the Federal Bureau of Investigation of the United States, the defendant, LANDON CONNER a/k/a LANDOE, knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device, a material fact, in that the defendant falsely informed Federal Bureau of Investigation special agents that he had not seen JF1 in his apartment, had never met JF1, and did not know how to contact the adult male that had accompanied JF1 to his apartment, despite having seen JF1 in his apartment, having met JF1, and knowing how to contact the adult male that had accompanied JF1 to his apartment.

All in violation of Title 18, United States Code, Section 1001.

COUNT 9
(Sex Trafficking by Force, Fraud, or Coercion)

During at least August 2005, and continuing through and including July 2006, in the Western District of Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH,

1 did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport,
2 provide, and obtain by any means, an adult female, that is AF1, with knowledge that force,
3 fraud, or coercion would be used to cause AF1 to engage in a commercial sex act.

4 All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1)
5 and 2.

6
7 **COUNT 10**
8 **(Interstate Transportation in Furtherance of Prostitution)**

9 During and between January 2006, and April 2006, in the Western District of
10 Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH knowingly transported,
11 and aided and abetted the transportation of, an adult female, AF1, in interstate commerce,
12 specifically, from Washington, to Nevada, with the intent that AF1 engage in prostitution.

13 All in violation of Title 18, United States Code, Sections 2421 and 2.

14 //

15 //

16 //

COUNT 11
(Interstate Transportation in Furtherance of Prostitution)

During and between January 2006, and April 2006, in the Western District of Washington, and elsewhere, SEAN JARAE HART a/k/a HUSH knowingly transported, and aided and abetted the transportation of, an adult female, AF2, in interstate commerce, specifically from Washington to Nevada, with the intent that AF2 engage in prostitution.

All in violation of Title 18, United States Code, Sections 2421 and 2.

A TRUE BILL


DATED: 6/6/07

(Signature of Foreperson redacted pursuant to the policy of the Judicial Conference.)

FOREPERSON



JEFFREY C. SULLIVAN
UNITED STATES ATTORNEY



ANNETTE L. HAYES
ASSISTANT UNITED STATES ATTORNEY



JILL OTAKE
ASSISTANT UNITED STATES ATTORNEY



YE-TING WOO
ASSISTANT UNITED STATES ATTORNEY